



Maryland Department of Environment
Water Management Administration
Compliance Program - Eastern Division
407 Race St, Cambridge, MD 21613
410-901-4020

Field Inspection Report by: Michele Burroughs

Media Type(s): NPDES Municipal Minor Surface Water

Inspection Date: August 5, 2011

Site Name: Assateague Island-National Seashore HQ WWTP

Facility Address: 7206 National Seashore Lane, Berlin, MD 21811

County: Worcester County

NPDES Municipal Minor Surface Water

Permit / Approval Numbers: DP-2530/MD0021091

Site Status: Active

Site Condition: Noncompliance

Contact(s):

Chandra Singh – Environmental Consultant

Steve Main – contract operator

Recommended Action: Continue Routine Investigation

Inspection Reason: Initial Quarterly, Initial Yearly

Evidence Collected:

Visual Observation

Inspection Findings:

A. Permit Verification

The facility holds State Discharge Permit 05-DP-2530, NPDES Permit MD0021091, which became effective July 1, 2006 and expired June 30, 2011. The permit application has been received by the Department, and the permit has been administratively extended.

B. Records

June 2011- The DMR shows noncompliance. The laboratory data sheets and chains of custody were available. The chain of custody failed to record the start and stop time of the composite sample. The pH range was reported as 7.7 to 8.8 s.u. with 6 excursions. There minimum dissolved oxygen concentration was reported as 2.7 mg/l with 9 excursions. The TSS monthly average loading was reported as 1 lb/day, the weekly average loading as 1.9 lb/day, the monthly average concentration as 28 mg/l, and the weekly average concentration as 112 mg/l with 6 excursions. The number of TSS excursions should have been reported as 5 for this monitoring period. The total nitrogen monthly average loading was reported as 0.2 lbs/day, the weekly average loading as 0.45 lbs/day, the

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monthly average concentration as 4.0 mg/l, and the weekly average concentration as 10.4 mg/l with 3 excursions. The average daily flow was reported as 0.005 MGD. The laboratory data sheets and chains of custody were available. The TSS result for 6/2/2011 of 112.8 mg/l was transcribed to the MOR as 112.1 mg/l. The TN result for 6/9/2011 of 1.38 mg/l was transcribed onto the MOR as 1.36 mg/l. The TN result of 10.6 mg/l on 6/23/2011 was transcribed onto the MOR as 10.4 mg/l.

May 2011 - The DMR shows compliance. The laboratory data sheets and chains of custody were available. The chain of custody failed to record the start and stop time of the composite sample. The average daily flow was 0.003 MGD. The TN results of 1.88 mg/l on 5/5/2011 was transcribed as 1.89 mg/l on the MOR. The TN results of 1.76 mg/l on 5/26/2011 was transcribed as 1.75 mg/l on the MOR.

April 2011 - The DMR shows noncompliance. The laboratory data sheets and chains of custody were not available. The BOD monthly average loading was reported as 1 lb/day, the weekly average loading as 1.1 lb/day, the monthly average concentration as 22 mg/l, and the weekly average concentration as 46 mg/l with 4 excursions. The total phosphorus monthly average loading was reported as 0.01 lbs/day, the weekly average loading as 0.031 lbs/day, the monthly average concentration as 0.3 mg/l, and the weekly average concentration as 0.87 mg/l with 2 excursions.

C. Maintenance and Operations

The system consists of a bar screen, followed by vibratory separator, an equalization tank, anoxic tank, an aerobic tank, a second anoxic tank and a reaeration tank. The effluent from the reaeration tanks is filtered through two parallel basket filters prior to treatment by 4 Berghof ultrafilters. The permeate from the ultrafilters is disinfected with 2 UV units, followed by a 2000 gallon vertical tank.

Since the prior inspection, Mr. Main has retired for the Park Service. Due to personnel issues, SOS is acting as superintendent of the facility, and have contracted with Mr. Steve Main as an operator. MR Singh stated that the Park Service is attempting to hire their own operators and are scheduled to bring them on during August and September 2011.

According to Mr. Singh, the variable frequency drives for the blowers failed in June due to melting during the 100 + degree weather. The drives were mounted outside of the building and were not ventilated. Blower 1 had been replaced with ventilation and was operating during the inspection. Blower 2 had not yet been replaced at the time of the inspection. Inspection of the vfd showed that the plastic had melted on the housing of the vfd and there were scorch mark from the back of the vfd onto the panel. Mr. Singh stated that a new blower has been ordered. Mr. Singh stated that a Rinnai hot water heater has been added to the facility to aid in cleaning the filters. Mr. Singh stated that water needed to be 100 degrees + for the filter cleaning. A pump is used to decant clear water from the septic tank to the pump station. The facility is now aerating the pump station with soda ash to accept the Island waste, which is trucked to the plant. Mr. Singh stated that he is experimenting with adding this waste to replace some of the Micro C presently being used by the facility.

Mr. John Adams holds license 3089, which expires 2/1/2014. Mr. Micael Bostick holds license 2419, which expires 3/1/2012.

D. Effluent Receiving Water

The facility was discharging at the time of the inspection. The effluent appeared to be clear with no apparent odor.

E. Sampling

There were no samples collected during this inspection.

F. Stormwater Pollution Prevention Plan

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This facility is not required to develop nor implement a stormwater pollution prevention plan.

G. Corrective Actions

1. The permittee is advised that the facility should operate the facility in compliance with permit requirements, including but not limited to compliance with discharge permit limits.
2. The permittee is reminded that the flow meter should be calibrated on an annual basis. The permittee is reminded of the necessary changes to the Monthly Operating Report (MOR) due to changes in the definition of weekly average (Sunday to Saturday) in the new permit.
3. The permittee is requested to document the start and stop times for the composite sample on the chains of custody.

NPDES Municipal Minor Surface Water - Inspection Checklist

<i>Inspection Item</i>	<i>Status</i>	<i>Comments</i>
1. Does the facility have a discharge permit? [Environment Article §9-323a(1-3)]	No Violations Observed	
2. Is the discharge permit current? Has facility applied for renewal? [Environment Article §9-328a(1)]	No Violations Observed	
3. Is the facility as described in the current permit? Are treatment processes as described in the current permit? [COMAR 26.08.04.01.01B(4)]	No Violations Observed	
4. Has notification been submitted about any new, different or increased discharges? [40 CFR Part 122 Subpart C Section 122.42.b(1-3)]	No Violations Observed	
5. Is the number and location of discharge points as described in the discharge permit? [Environment Article §9-3314]	No Violations Observed	
6. Has permittee submitted correct name and address of receiving waters? [40 CFR 122.21.j(3)]	No Violations Observed	
7. Is the permittee meeting the compliance schedule per permit requirements? [COMAR 26.08.04.02-1.02-1A(3)]	Not Applicable	
8. Has the operator or superintendent been certified by the Board in the appropriate classification for the facility? [COMAR 26.06.01.05A(1)]	No Violations Observed	
9. Are adequate records being maintained for the sampling date, time, and exact location; analysis dates and times; individual performing analysis; and analytical results? [COMAR 26.08.04.03.03B(3)(a, b, c, e)]	Out of Compliance	See findings.
10. Are adequate records being maintained for the analytical methods/techniques used? [COMAR 26.08.04.03.03B(3)(d)]	No Violations Observed	

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11. Does the permittee retained a minimum of 3 years worth of monitoring records including raw data and original strip chart recordings; calibration and maintenance records; and reports? [COMAR 26.08.04.03.03B(1)]	No Violations Observed	
12. Is the lab and monitoring equipment being properly calibrated and maintained? Are they keeping records to reflect this? [Environment Article §9-3313]	No Violations Observed	
13. Is laboratory controls and appropriate quality assurance procedures properly operated and maintained? [40 CFR Part 122 Subpart C Section 122.41.e]	No Violations Observed	
14. Has the permittee submitted the monitoring results on the proper Discharge Monitoring Report form? [COMAR 26.08.04.03.03C(1)]	No Violations Observed	
15. Has the permittee submitted these results within the allotted time? [COMAR 26.08.04.03.03C(2)]	No Violations Observed	
16. Are discharge monitoring reports complete and reflect permit conditions? [COMAR 26.08.04.03B(3)]	No Violations Observed	
17. Is the facility being properly operated and maintained including:(a) stand-by power or equivalent provisions available, (b) adequate alarm system for power or equipment failure available, (c) all treatments units are in service, . [40 CFR Part 122 Subpart C Section 122.41.e]	No Violations Observed	
18. Is sewage sludge managed correctly per permit requirements? [COMAR 26.04.06.03.03]	No Violations Observed	
19. Any by-pass since last inspection? Has permittee submitted notice of any by-pass? [40 CFR Part 122 Subpart C Section 122.41.m(4)(i)(C)]	No Violations Observed	
20. Any non-complying discharges experienced since last inspection? Has regulatory agency been notified? [40 CFR Part 122 Subpart C Section 122.41.l(6)]	Out of Compliance	See findings.
21. Have overflows occurred since the last inspection? [COMAR 26.08.10.02A]	No Violations Observed	
22. Has records of overflows been maintained at the facility for at least five years? [COMAR 26.08.10.06A-B]	No Violations Observed	
23. Are flow measuring devices properly installed and operated, calibration frequency of flow meter adequate, flow measurement equipment adequate to handle expected ranges of flow? [40 CFR Part 122 Subpart C Section 122.41.e]	Out of Compliance	See findings.

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24. Are discharge monitoring points adequate for representative sampling? Do parameters and sampling frequency meet the minimum requirements? Does the permittee use the method of sample collection required by the permit? [Environment Article §9-331(4)]	No Violations Observed	
25. Are analytical testing procedures approved by EPA? If alternate analytical procedures are used, proper approval has been obtained? [COMAR 26.08.01.02B(1)]	No Violations Observed	
26. Has the permittee notified the Department of the name and address of the commercial laboratory? [COMAR 26.08.04.03.03A(3)]	No Violations Observed	
27. Were discharges observed at the authorized outfalls? Does the facility have any unauthorized discharges to waters of the State? [Environment Article §9-322]	No Violations Observed	
28. Does the discharges or receiving waters have any visible pollutants (oil sheen, grease, turbidity, foam, floating solids, color), odor, noncompliant DO concentrations, and/or noncompliant temperature ranges? [Environment Article §9-314b(1)]	No Violations Observed	
29. Were discharge samples collected? [Environment Article §9-261c(1)]	No Violations Observed	
30. Is the facility required to have a storm water pollution prevention plan? Has storm water pollution prevention plan been developed and implemented as required? Does storm water pollution prevention plan require modifications to prevent runoff of pollutants? [40 CFR Part 122 Subpart B Section 122.26.c(1)(I)(A-B)]	Not Applicable	
31. Are the permit conditions being met? [Environment Article §9-326a(1)]	Out of Compliance	See findings.

Inspector: _____
 Michele Burroughs

Received by: _____